

REMARKS

Applicant respectfully requests reconsideration and allowance of the subject application.¹ Claims 62, 67, 70, 71, 74 and 75 are amended. Claims 62 to 77 are now pending.

I. Information Disclosure Statement

Applicant respectfully requests that the Examiner acknowledge and consider the Information Disclosure Statement filed on March 4, 2009.

II. Claim Rejections - 35 U.S.C. § 103

Claims 62 to 77 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,963,208 *Dolan et al.* ("*Dolan*"), in view of U.S. Patent No. 5,848,410 *Walls et al.* ("*Walls*"), and further in view of U.S. Patent No. 6,055,544 *DeRose et al.* ("*DeRose*").

Applicant respectfully submits that *Dolan* in view of *Walls* and further in view of *DeRose* cannot support a rejection of claim 62 under 35 U.S.C. § 103(a) because, taken individually or in combination, these references lack disclosing or suggesting each recited feature in claim 62. (See MPEP § 2143).

FIGs. 2-14 illustrate exemplary embodiments that are encompassed by Applicant's claim 62. These drawings illustrate creating a plurality of folders (for example, 210-Operating System Help Folder, 212-Book 1 or Book 2 and 214-Chapter 1 or Chapter 2) that are associated with a plurality of topics. Each Chapter may be associated with a topic. (Fig. 2 and page 15, lines 4-5). One or more HTML source files (for example, Book_1.html, Book_2.html, Chapter_1.html, and

¹ The Office Action contains statements characterizing the claims and related art. Regardless of whether any such statements are specifically addressed herein, Applicant's silence as to these characterizations does not constitute acceptance of them.

Chapter_2.html) for a given topic are stored in the associated folder (for example, 210-Operating System Help Folder, 212-Book 1 or Book 2 and 214-Chapter 1 or Chapter 2) (FIG. 10). The selection of one of a plurality of folders associated with a topic is detected (FIGs. 5-9, page 8, lines 12-20, page 9, lines 10-20, page 9, line 21- page 10, line 2 and page 10, lines 3-8). Each of the files at the first hierarchical level in the selected folder is then searched to identify files of a predetermined type. (FIG. 3, Step 325 and page 7, lines 4-18). The identified files are then examined to locate HTML metatags that pertain to the display of help information. (Step 330 and page 7, lines 19-23). A HTML template file is retrieved from computer (100) memory. (*Id.*). The located HTML metatags are then merged into the HTML template file. (Page 2, lines 20-22). An HTML file containing data associated with each of the located metatags is thereby generated. (Step 335 and page 7, lines 24-26). Then, an HTML page is displayed in accordance with the generated file to provide a table of contents for the topic of interest associated with the selected folder. (Step 335 and page 7, lines 24-26).

Claim 62 recites various features of the above-described exemplary embodiment. In particular, claim 62 recites:

examining each of the identified files to locate HTML metatags that pertain to the display of help information;
merging data associated with the HTML metatags into the HTML template file, by said computer, to thereby generate an HTML file containing data associated with each of the located HTML metatags.

Applicant respectfully asserts that *Dolan* lacks disclosing the aforementioned features of claim 62, for at least the following reasons.

Applicant respectfully submits that *Dolan* does not disclose or suggest "merging data associated with the HTML metatags into the HTML template file," as

recited in Applicant's claim 62. *Dolan* discloses parsing links from HTML documents to create navigation graph (106). (Column 3, lines 33-38). A link is a reference to an item of information accessible on a computer or network. (*Dolan*, column 5, lines 45-46). In contrast, an HTML metatag provides data associated with a particular label that is used to create a table of contents for a help system. (Applicant's specification, page 6, lines 18-20). Thus, *Dolan*'s links are not the claimed "HTML metatags."

Moreover, *Dolan* does not disclose that such links are merged with an HTML template file to generate another file. *Dolan*'s links are used to create a navigation graph (106). (Column 3, lines 33-38). The links are stored in navigation file (322) and graph manager (412) generates a navigation graph (106). (*Dolan*, column 10, line 65 - column 11, line 6). Nothing in *Dolan* discloses that navigation graph (106) is the result of merging metatags, or links, into an "HTML template file" as recited in Applicant's claim 62. Accordingly, *Dolan*'s generating a navigation graph from links parsed from HTML documents cannot anticipate the features of Applicant's claim 62 set forth above.

Additionally, Applicant respectfully asserts that one having ordinary skill in the art, when taking the context of the claimed subject matter as a whole, would not turn to *Dolan* and the secondary references of the combination to arrive at Applicant's claimed invention. Conceptually, *Dolan* starts by parsing links from HTML documents that are used to create a navigation graph (106). Graph manager (412) then generates a navigation graph (106). *Dolan*'s end result is a graph having a hierarchical organization. (*Dolan*, FIG. 2).

Conversely, the instant disclosure starts with a hierarchical organization having a plurality of folders and files at various hierarchical levels. Files at a first hierarchical level in a selected folder are searched to located metatags having associated data. The data associated with the HTML metatags are then merged into the HTML template file to generate an HTML page displaying the data associated with each of the located HTML metatags as an end result. In other words, in the instant application, an HTML page is generated based on data that is retrieved from a plurality of folders and files having a hierarchical organization, whereas in *Dolan*, a hierarchical graph is generated based on links parsed from HTML documents. Accordingly, taking the claim as a whole, one having ordinary skill in the art at the time of Applicant's invention, would not turn to *Dolan* to arrive at Applicant's claimed invention because *Dolan's* process of generating a graph from links parsed from HTML documents is generated in a conceptually different and reverse fashion to the claimed invention. Accordingly, Applicant respectfully submits that claim 62 is allowable over the combination of *Dolan*, *Walls* and *DeRose* for at least this additional reason.

Furthermore, regarding claim 67, the Office Action turns to *DeRose* to purportedly teach the claimed "HTML template file." (Office Action, page 5). *DeRose* teaches down-converting a fragment of a document in one markup language to a document in another markup language. (Column 12, lines 34-37). *DeRose's* down-conversion uses a mapping table that maps elements in the source markup language to corresponding elements in the target markup language. (Column 12, lines 48-50). One form of mapping table is a style sheet designed for a particular document type, as shown in Fig. 12A. (*DeRose*, column 12, lines 52-54).

The mapping table shown in Fig. 12A simply shows that a <title> tag is converted to an <H1> tag and a <chaptitle> tag is converted to an <H2> tag, for example.

(*DeRose*, column 12, lines 55-61). As such, *DeRose*'s style sheet or mapping table simply converts one tag into another tag. It does not function to merge, i.e.

incorporate, the data associated with a tag into an HTML template file.

Consequently, *DeRose*'s style sheet or mapping table used to down-convert a document from one markup language to another is not the claimed "HTML template file," into which data from another source is merged.

Moreover, *Walls* does not teach or suggest the above-mentioned claim feature of Applicant's claim 62. Therefore, *Walls* and *DeRose* do not cure the deficiencies of *Dolan*. Consequently, when *Dolan*, *Walls*, and *DeRose* are taken individually or in combination, they do not disclose or suggest all of the features recited in Applicant's claim 62.

The Office Action also alleges *Dolan* discloses the "examining" feature of claim 62. (Office Action, page 3 *citing Dolan* column 11, lines 49-60 and FIG. 7). In contrast to Applicant's claim 62, *Dolan* discloses parsing links from HTML documents to create navigation graph (106). (Column 3, lines 33-38). Thus, in *Dolan*, HTML documents are examined for links. Applicant respectfully submits that links are different in both function and effect from the claimed "metatags."

As discussed previously, a link is a reference to an item of information accessible on a computer or network. (*Dolan*, column 5, lines 45-46). Conversely, an HTML metatag provides information used to create a table of contents for a help system. (Applicant's specification, page 6, lines 18-20). The Office Action alleges the fields in a link record (700), such as author field (708), version field (702) and

access time/date field (710) are metatags. (Office Action, page 3, last paragraph). However, the link record fields simply include attributes of the link represented by link record (700). (*Dolan*, column 11, lines 52-60). Consequently, *Dolan* does not disclose "examining...files to locate HTML metatags," as recited in Applicant's claim 62.

Moreover, the Office Action alleges *Dolan* discloses the "generating" feature of Applicant's claim 62. (Office Action, page 3 *citing Dolan* column 3, lines 33-38, column 10, line 65-column 11, line 6 and column 17, line 40-column 18, line 43). Applicant respectfully asserts that the Office Action has not established a relationship between *Dolan's* parsing an HTML document and generating a navigation graph (106) and the claimed locating an HTML metatag and generating an HTML file containing data associated with each of the located metatags as recited in claim 62. Applicant respectfully submits that *Dolan's* links are stored in navigation file (322) and that navigation graph manager (412) generates navigation graph (106). Navigation graph (106) is not an HTML document. Accordingly, *Dolan* does not generate an HTML file from the links parsed from an HTML document and display a generated HTML file on view window (104). Therefore, *Dolan* does not disclose the above-mentioned feature of claim 62.

Furthermore, the Office Action alleges if *Dolan* does not disclose metatags, that *Walls* teaches "parsing metatags for creating an index." (Office Action, page 3, *citing Walls* column 6, lines 16-35 and column 14, lines 23-25). However, *Walls* does not teach or suggest the above-mentioned features of claim 62. Therefore, *Walls* does not cure the deficiencies of *Dolan*.

Additionally, *DeRose* is cited for purportedly teaching "generating a table of contents of a large on-line help document for a bicycle (Operation Manual)." (Office Action, page 4). However, *DeRose* does not disclose or suggest the aforementioned features of claim 62. Therefore, the purported combination of *Dolan* in view of *Walls* and further in view of *DeRose*, cannot support a rejection of claim 62 under 35 U.S.C. § 103(a). Accordingly, Applicant respectfully requests that the rejection of claim 62 be withdrawn.

Furthermore, Applicant respectfully submits claims 63-69 are allowable over *Dolan* in view of *Walls* and further in view of *DeRose* at least due to their corresponding dependence from claim 62.

Independent claim 70 recites features similar to those distinguishing features recited in claim 62 and set forth above. Claim 70 is allowable for at least this additional reason.

Applicant respectfully submits claims 71-77 are allowable over the combination of *Dolan*, *Walls* and *DeRose* at least due to their dependence from claim 70.

III. Conclusion

Reconsideration and withdrawal of the rejections, and allowance of all pending claims, are respectfully requested.

Respectfully submitted,

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